

UNITED STATES DISTRICT COURT  
DISTRICT OF CONNECTICUT

N-11-4

UNITED STATES OF AMERICA

v.

ROBERT BRADDOCK, JR.

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3:12cr 157 (

VIOLATIONS:

18 U.S.C. § 371 (Conspiracy);  
2 U.S.C. § 441f, 18 U.S.C. § 2  
(Contributions in the Name of  
Another);  
18 U.S.C. § 1001(a)(2), 2  
(Causing False Statements)

U.S. DISTRICT COURT  
NEW HAVEN, CT.

2012 JUL 11 PM 3 29

FILED

(JBA)

INDICTMENT

The Grand Jury charges:

GENERAL ALLEGATIONS

At all times relevant to this Indictment:

The Connecticut General Assembly

1. The Connecticut General Assembly ("CGA") was a political sub-division within the State of Connecticut, constituting the legislative branch of Connecticut's state government. The CGA was composed of two chambers: the House of Representatives and the Senate. The CGA's 2012 legislative session commenced on February 8, 2012 and ended on May 9, 2012.

Roll Your Own Smoke Shops

2. Roll Your Own ("RYO") smoke shops were retail businesses operating in the State of Connecticut and elsewhere, which sold loose smoking tobacco and cigarette-rolling materials. These items were subject to Connecticut's sales tax. RYO smoke shops also offered customers the option of paying a "rental" fee to insert the loose tobacco and the

rolling materials into a RYO machine, which was capable of rapidly rolling large quantities of cigarettes. Customers did not pay a tax on the RYO cigarettes when rolled by the RYO machines, in contrast to cigarettes purchased over-the-counter.

#### The RYO Litigation

3. In August 2011, the State of Connecticut applied for an order permanently enjoining the RYO smoke shops from operating RYO machines, which the State argued were tobacco manufacturing devices under Connecticut law (the “RYO Litigation”). According to the State of Connecticut, the RYO smoke shop owners were not complying with health and safety regulations and a specific tax regime governing owners and operators of tobacco manufacturing devices.

4. On February 24, 2012, the Connecticut Superior Court issued a Memorandum of Decision in the RYO Litigation. The Court ruled that, subject to certain restrictions, RYO machines were not tobacco manufacturing devices, and that RYO smoke shop owners could continue to operate RYO machines without being subject to the health and safety regulations and tax regime governing tobacco manufacturing devices.

#### The RYO Legislation

5. On April 3, 2012, the CGA’s Joint Committee on Finance, Revenue and Bonding (the “Finance Committee”) voted in favor of a “Joint Favorable Substitute” revision to Senate Bill 357, an Act Concerning Various Statutes Related to the Department of Revenue Services (the “RYO Legislation”). If enacted, the RYO Legislation would have effectively overturned the Connecticut Superior Court’s ruling in the RYO Litigation by deeming RYO smoke shop owners to be tobacco manufacturers under Connecticut law, a

designation that would have subjected RYO smoke shop owners to a substantial licensing fee and tax increase.

6. On May 9, 2012, the CGA's 2012 legislative session ended. The RYO Legislation was not called for a vote by either chamber of the CGA.

Relevant Individuals

7. Public Official Number 1 was a member of the CGA and a candidate for election to the United States House of Representatives.

8. ROBERT BRADDOCK, JR. was a resident of Meriden, Connecticut and the Finance Director for Public Official Number 1's campaign for election to the United States House of Representatives (the "Campaign Committee").

9. Unindicted Co-Conspirator 1 ("CC-1") was an associate of various RYO smoke shop owners.

10. RYO Owner 1 had a business interest in the RYO smoke shop industry in Connecticut from August 2010 through March 2012.

11. RYO Owner 2, an unindicted co-conspirator, was a co-owner of a RYO smoke shop with two locations in Waterbury, Connecticut.

12. RYO Owner 3, an unindicted co-conspirator, was a co-owner of a RYO smoke shop with two locations in Waterbury, Connecticut.

13. Campaign Aide 1, an unindicted co-conspirator, was an employee of the Campaign Committee.

14. Campaign Aide 2 was an employee of the Campaign Committee.



### The Election Act

15. The Federal Election Campaign Act of 1971, as amended, Title 2, United States Code, Sections 431, et seq. ("Election Act"), limited financial influence in the election of candidates for federal office, including the office of United States Representative, and provided for public disclosure of federal election campaigns:

- a. The Election Act limited the amount and source of money that may be contributed to a federal candidate or that candidate's authorized campaign committee ("contributions").
- b. The Election Act prohibited any person from making contributions in the name of another, including reimbursing a third person, before or after that third person's contribution, as inducement to make that contribution ("reimbursement").
- c. The Election Act prohibited contributions of corporate money.
- d. In 2011 and 2012, the Election Act limited primary and general election campaign contributions to \$2,500 each for a total of \$5,000, from any individuals to any one candidate.

16. The Federal Election Commission was an agency and department of the United States with jurisdiction to enforce the limits and prohibitions of the Election Act, and to compile and publicly report accurate information about the source and amount of contributions.

17. The Federal Bureau of Investigation was an agency and department of the United States with jurisdiction to enforce the limits and prohibitions of the Election Act.



COUNT ONE  
(Conspiracy)

18. The allegations contained in paragraphs 1 through 17 of this Indictment are realleged and incorporated as though fully set forth herein.

19. From in or about November 2011 through in or about May 2012, in the District of Connecticut and elsewhere, the defendant ROBERT BRADDOCK, JR. ("BRADDOCK"), conspired with others known and unknown to the Grand Jury to:

- a. Knowingly and willfully accept contributions to the Campaign Committee made by one person in the name of another person, aggregating more than \$10,000 in calendar year 2012, in violation of Title 2, United States Code, Sections 437g(d)(1)(D)(i) and 441f.
- b. Knowingly and willfully cause the submission of a materially false, fictitious, and fraudulent statement and representation, that is, the submission by the Campaign Committee to the Federal Election Commission of a report that was materially false in reporting the source and amount of contributions to the Campaign Committee, in violation of Title 18, United States Code, Sections 1001(a)(2) and 2.

The Purpose of the Conspiracy

20. The purpose of the conspiracy was to violate the limits and prohibitions on contributions to the Campaign Committee, and to conceal the amount and source of those contributions from federal agencies and departments with jurisdiction to administer and investigate those contributions.

### Manner and Means of the Conspiracy

The conspiracy used the following manner and means, among others:

21. On November 2, 2011, CC-1, RYO Owner 1, RYO Owner 2 and others met at a RYO smoke shop in Waterbury, Connecticut. At that meeting, the participants discussed the possibility that the CGA would enact legislation harmful to RYO smoke shop owners' business interests during the CGA's 2012 legislative session. During that meeting, CC-1 engaged in a telephone conversation with Public Official Number 1 for the purpose of arranging a meeting between certain RYO smoke shop owners and Public Official Number 1. The meeting was scheduled for the morning of November 16, 2011 at a restaurant in Meriden, Connecticut.

22. On November 15, 2011, CC-1, RYO Owner 2 and RYO Owner 3 attended a fundraising event for the Campaign Committee in Waterbury, Connecticut. At that event, CC-1 and RYO Owner 2 delivered to BRADDOCK a \$2,500 contribution to the Campaign Committee in the form of a personal check written by an individual whom RYO Owner 2 had recruited to write the check in exchange for a reimbursement of \$2,500 in U.S. currency. The \$2,500 contribution to the Campaign Committee was in the form of an illegal "conduit contribution," that is, a contribution made by one person in the name of another.

23. On November 15, 2011 at approximately 8:35 p.m, RYO Owner 2 advised RYO Owner 1 that he had met with BRADDOCK at the fundraising event earlier that evening. RYO Owner 2 indicated that CC-1 and individuals associated with the Campaign Committee had "already discussed in great detail about their strategy for the whole thing." According to RYO Owner 2, BRADDOCK instructed him and CC-1 that they should not "talk about a bill" during their meeting with Public Official Number 1 on November 16

because, "there is always people following this guy around, watching what he's doing . . ."

RYO Owner 2 then advised RYO Owner 1 that he should bring a \$2,500 contribution to the upcoming meeting with Public Official Number 1. RYO Owner 2 instructed RYO Owner 1 that he should "give someone else the money and they could write the check." RYO Owner 2 advised that he and CC-1 agreed that the check "can't be business." RYO Owner 2 added: "We had one of our employees. She just wrote a check for us."

24. On the morning of November 16, 2011, CC-1, RYO Owner 1 and RYO Owner 3 met at a RYO smoke shop prior to meeting with Public Official Number 1. CC-1 explained to RYO Owner 1 and RYO Owner 3 that, during the meeting with Public Official Number 1, they should not "bring up any bills," because "the men in black running around . . . all the time . . . and we say, 'hey, we don't want you to do this bill,' . . . that's the same as me giving him a twenty, hundred dollar bill, 'let me go on the f\_cking two ounces you got me with'." CC-1 then advised RYO Owner 1 and RYO Owner 3 that he had already met with BRADDOCK, that BRADDOCK "knows the deal," and that he (CC-1) had to give BRADDOCK "that on the side."

25. On the morning of November 16, 2012, immediately prior to the meeting with Public Official Number 1, CC-1, RYO Owner 1 and RYO Owner 3 met in the parking lot at the restaurant in Meriden, Connecticut. CC-1 advised RYO Owner 3 that, in addition to the \$2,500 conduit contribution RYO Owner 2 and RYO Owner 3 made on November 15, 2011, RYO Owner 1 and RYO Owner 3 were supposed to deliver "three more checks this morning," totaling \$7,500. RYO Owner 3 advised CC-1 that he and RYO Owner 2 had contributed \$2,500 at the fundraising event the previous evening, referring to the conduit contribution. CC-1 then advised RYO Owner 1 that the plan was to start with a payment of



“ten grand” to the Campaign Committee, followed by additional payments up to \$30,000 if they were “happy.” RYO Owner 3 then asked, “do you have a pen,” and wrote a \$2,500 check to the Campaign Committee in the name of a conduit contributor and then handed the check to CC-1. RYO Owner 2 later reimbursed the conduit contributor by providing him with \$2,500 in U.S. currency.

26. On the morning of November 16, 2011, CC-1, RYO Owner 1 and RYO Owner 3 met with Public Official Number 1 and BRADDOCK at a restaurant in Meriden, Connecticut. Immediately prior to that meeting, CC-1 advised BRADDOCK that he had an “envelope,” and then handed BRADDOCK an envelope containing the \$2,500 conduit contribution. During the meeting with Public Official Number 1, CC-1, RYO Owner 1 and RYO Owner 3 discussed various issues relating to the RYO industry in Connecticut.

27. On November 30, 2011, CC-1, RYO Owner 1, RYO Owner 2 and others met at a RYO smoke shop in Waterbury, Connecticut. The participants agreed that they would complete the initial \$10,000 payment by delivering two \$2,500 conduit contributions to the Campaign Committee at a fundraising event scheduled for December 8, 2011.

28. On December 8, 2011, CC-1, RYO Owner 1, RYO Owner 2 and others met at a RYO smoke shop in Waterbury, Connecticut. Prior to that meeting, RYO Owner 2 obtained a \$2,500 check made payable to the Campaign Committee from a conduit contributor, who was reimbursed by RYO Owner 2 and RYO Owner 3 with \$2,500 in U.S. currency. During that meeting, RYO Owner 1 and RYO Owner 2 provided another individual with \$2,500 in U.S. currency, and that individual then wrote a check for \$2,500 in his wife’s name, making it payable to the Campaign Committee. During the meeting, RYO Owner 2 explained that it was necessary to use conduit contributors to prevent people from

drawing a connection between their contributions to the Campaign Committee and the defeat of legislation that might be introduced during the CGA's 2012 legislative session. RYO Owner 2 said, "something happens, they say why the f\_ck did these guys donate ten thousand to this campaign."

29. On December 8, 2011, CC-1, RYO Owner 1 and RYO Owner 2 attended a fundraising event for the Campaign Committee, which was held at a hotel in Waterbury, Connecticut. During that event, RYO Owner 1 handed BRADDOCK the two additional \$2,500 conduit contributions. Shortly after accepting the checks, BRADDOCK advised CC-1, RYO Owner 1 and RYO Owner 2, "You're gonna be fine. I wouldn't go repeating what I just said, but I think you're gonna be fine."

30. On or about January 31, 2012, the Campaign Committee submitted to the Federal Election Commission a report of the Campaign Committee's receipts and disbursements for the period October 1, 2011 through December 31, 2011. The report falsely reported the source and amount of four \$2,500 contributions that were received and deposited by the Campaign Committee during that time period.

#### The Decision in the RYO Litigation

31. On February 29, 2012, CC-1, RYO Owner 1, RYO Owner 2 and others met at a Waterbury restaurant to discuss the previously agreed upon strategy for preventing the enactment of any legislation that would seek to overturn the February 24, 2012 ruling in the RYO Litigation. During the meeting, CC-1 described the possibility that such legislation could be proposed through an emergency certification procedure that would require the approval of Public Official Number 1. The participants agreed that they would proceed with

their original plan to make additional contributions to the Campaign Committee to prevent any legislation from being enacted.

32. On March 22, 2012, CC-1 and RYO Owner 2 met with two undercover FBI agents ("UCE-1" and "UCE-2"), who were posing as RYO investors with an interest in maintaining the tax-exempt status of RYO cigarettes in Connecticut. During the meeting, CC-1 explained that it is a lot easier to "kill" a bill than it is to get a bill passed. CC-1 said that, even if a bill was passed out of a committee, it would have to be approved by Public Official Number 1. He stated, "Alright, if it makes it through all the committees, again, now [Public Official 1] has to call it though. I said thank you to [Public Official 1] in the tune of ten thousand dollars." CC-1 then suggested that if the UCE's wanted to keep Public Official Number 1 happy, they should "do another 10." UCE-1 and UCE-2, acting in their undercover capacity as RYO investors, agreed to finance the next \$10,000 contribution to the Campaign Committee.

33. On March 27, 2012, CC-1 received a telephone call from Campaign Aide 1. During the telephone call, CC-1 advised Campaign Aide 1 that "them people are coming back into town next week, and, uh, they're gonna have some more pieces of paper." Campaign Aide 1 responded, "Alright, the end of the week is an important deadline for us. And, I know you talked to Rob (referring to BRADDOCK) on Friday . . . anything that you can do before the end of the week, we would greatly appreciate . . ."

The RYO Legislation and Additional Conduit Contributions to the Campaign Committee

34. On the morning of April 3, 2012, the RYO Legislation was introduced in the CGA's Finance Committee. Later that day, the Finance Committee voted in favor of the RYO Legislation by a vote of 33 to 17, with three members absent.



35. On April 3, 2012 at approximately 12:45 p.m., CC-1 advised Campaign Aide 1 that he needed "to get together with Rob (referring to BRADDOCK)," on April 11, 2012 at 6:00. CC-1 said, "I'm going to have something for him." Campaign Aide 1 asked if they could meet a little later, but added, "[i]f it has to be six we'll be there." CC-1 responded, "[T]his is the guy that's bringing the envelope," prompting Campaign Aide 1 to ask, "Do you know how big it will be, or what?" CC-1 responded, "Five."

36. On April 3, 2012, at approximately 4:43 p.m., CC-1 placed a telephone call to UCE-1. During the call, CC-1 advised UCE-1 that he had scheduled a meeting with BRADDOCK and Campaign Aide 1. CC-1 and UCE-1 agreed that UCE-1 would provide CC-1 with \$10,000 in cash so that CC-1 could recruit and reimburse conduit contributors to write checks to the Campaign Committee. CC-1 and UCE-1 agreed that the \$10,000 payment in the form of conduit contributions to the Campaign Committee would be delivered to BRADDOCK and Campaign Aide 1 at the upcoming meeting.

37. On April 4, 2012, CC-1 and UCE-1 met in Connecticut. At that meeting, UCE-1 provided CC-1 with \$11,000 in U.S. currency. CC-1 agreed that he would arrange for \$10,000 of that money to be used to pay conduit contributors who would write checks to the Campaign Committee. CC-1 accepted the remaining \$1,000 as purported payment for his efforts to arrange the defeat of the RYO Legislation.

38. During the afternoon of April 9, 2012, CC-1 placed a telephone call to BRADDOCK. During the call, CC-1 sought to confirm that BRADDOCK and Campaign Aide 1 would attend a meeting with CC-1, RYO Owner 2 and UCE-1 on April 11, 2012. CC-1 advised BRADDOCK, "I got ah, another ten grand for you," to which BRADDOCK responded, "You're the f\_cking man, man. I'll be there."

39. During the evening of April 9, 2012, CC-1 received a telephone call to Campaign Aide 1. During the call, CC-1 confirmed that Campaign Aide 1 would attend a meeting with CC-1, RYO Owner 2 and UCE-1 on April 11, 2012. Campaign Aide 1 advised CC-1 that, because Public Official Number 1 was running for a federal office, CC-1 did not have to complete contribution forms in connection with the checks that CC-1 intended to deliver on April 11. CC-1 responded, "Ok, so I just bring the checks?," to which Campaign Aide 1 responded, "You got it." CC-1 then said, "Alright. I'll have, uh, four twenty-five hundred dollar checks," to which Campaign Aide 1 responded, "Wow, that's great man." Moments later, CC-1 said, "Well you, you know my reasoning," to which Campaign Aide 1 responded, "Yep, I do."

40. In advance of the April 11 meeting, CC-1 and RYO Owner 2 recruited four individuals to serve as conduit contributors in connection with the \$10,000 payment to the Campaign Committee that CC-1 and RYO Owner 2 intended to deliver to BRADDOCK and Campaign Aide 1 on April 11, 2012. CC-1 and RYO Owner 2 provided each conduit contributor with \$2,500 in U.S. currency in exchange for a \$2,500 check written to the Campaign Committee.

41. On April 11, 2012, at approximately 6:30 p.m., CC-1, RYO Owner 2, UCE-1, Campaign Aide 1 and BRADDOCK met at a restaurant in Southington, Connecticut. Prior to the meeting, CC-1 provided UCE-1 with the four \$2,500 checks in the names of conduit contributors. At the meeting, UCE-1 delivered the four \$2,500 checks written in the name of conduit contributors to BRADDOCK and Campaign Aide 1. During the meeting, UCE-1 advised BRADDOCK and Campaign Aide 1 that his objective was to "do what [he] can to make sure that thing gets killed." UCE-1 then advised BRADDOCK and Campaign Aide 1

that he was not "on" any of the checks. Specifically, UCE-1 said, "I'm not on any of them. But, if you think a more public showing from Roll-Your-Own, then that's fine. I was just under the understanding that I thought it might be sensitive. If we're out there, then that may be more of a red flag, but I can switch that, right [CC-1]? And, there are no duplicates in here from last time?," referring to the names that were used to make the initial \$10,000 payment in November and December 2011. CC-1 responded, "No, no, no, I know how this works. Can't be duplicates." Later in the conversation, UCE-1 said to Campaign Aide 1 and BRADDOCK, "And, even though my name is not on there, you know that it is me."

42. On April 23, 2012, Campaign Aide 1 advised CC-1 that one of the checks CC-1 delivered on April 11, 2012 had bounced. CC-1 responded, "Everybody was, everybody was given the cash, to deposit. I'll make the call right now." Campaign Aide 1 then provided CC-1 with the name of the conduit contributor whose name appeared on the bounced check. Campaign Aide 1 advised CC-1 that the Campaign Committee, "need[s] the check, ah, by tomorrow at midnight," to which CC-1 responded, "Ah, well that, okay. I will do whatever I gotta do, alright?"

43. On April 23, 2011 and April 24, 2011, CC-1 engaged in a series of telephone calls with RYO Owner 2 in an effort to obtain a check to replace the bounced check. RYO Owner 2 and CC-1 agreed that RYO Owner 2 would obtain a \$2,500 bank check from the same conduit contributor and \$60 in cash to cover the bank charge associated with the bounced check, and then leave those items at his RYO smoke shop the following morning. RYO Owner 2 then obtained the \$2,500 bank check from the conduit contributor, whom he had previously provided \$2,500 in U.S. currency.



44. On April 24, 2012, Campaign Aide 1 contacted CC-1 to advise him that an employee of the Campaign Committee had retrieved the replacement check from RYO Owner 2's smoke shop. Campaign Aide 1 thanked CC-1 for obtaining the replacement check.

45. On April 25, 2012 at approximately 7:25 p.m., CC-1 advised Campaign Aide 1 that CC-1 had "another ten grand to, uh, distribute to [Public Official Number 1] to make sure this bill stays out, off of the table," and that he would "have the checks on Wednesday." CC-1 asked Campaign Aide 1, "is that gonna do it?," to which Campaign Aide 1 responded, "Wow, uh, right now. Ah, yes, whatever you can do is great." Campaign Aide 1 then instructed CC-1 that one of the checks should be made out to a state political party to pay a videographer who recorded Public Official Number 1's opponents.

46. On April 25, 2012 at approximately 7:53 p.m., CC-1 and RYO Owner 2 discussed a plan to make an additional \$10,000 payment to the Campaign Committee. RYO Owner 2 advised CC-1 that he would recruit four additional conduit contributors to write \$2,500 checks to the Campaign Committee, totaling \$10,000. RYO Owner 2 advised CC-1, "[s]o I'm gonna need, uh, four for [Public Official Number 1]."

47. The CGA's 2012 legislative session ended at 11:59 p.m. on May 9, 2012. The RYO Legislation was not called for a vote by either chamber of the CGA.

48. On or about May 2, 2012, the Campaign Committee submitted to the Federal Election Commission a report of the Campaign Committee's receipts and disbursements for the period April 1, 2012 through April 24, 2012. The report falsely reported the source and amount of four \$2,500 contributions that were received and deposited by the Campaign Committee during that time period.

49. On May 14, 2012, Campaign Aide 1 contacted CC-1 to invite him to a political convention that evening at which Public Official Number 1 would be seeking the endorsement of a political party. Initially, CC-1 did not agree to attend the convention but, referring to the final payment of \$10,000, said, "I didn't forget. Um, I'm trying, I gotta put together. Whatever dope addicts and drug pushers are gonna be writing these phony checks so, but I didn't forget you. . ." Campaign Aide 1 responded, "No problem, man." CC-1 then said that maybe he would "make an appearance," explaining that he wanted "to meet with [Public Official Number 1] and thank him personally."

50. On May 14, 2012, CC-1 attended the nominating convention for Public Official Number 1. After entering the convention hall, CC-1 greeted Campaign Aide 1. Campaign Aide 1 then led CC-1 to a backstage area, at which point Public Official Number 1 approached CC-1 and engaged him in a conversation. Immediately following that conversation, Campaign Aide 1 led CC-1 into a back room where CC-1 delivered a \$10,000 payment in the form of three \$2,500 conduit contributions to the Campaign Committee and one \$2,500 check to a political party. As he was exiting the convention hall, CC-1 encountered BRADDOCK. CC-1 and BRADDOCK stepped to a quiet location, and CC-1 said that he had just "thanked the man," and that "twenty thousand was well worth it. . . And another ten grand." BRADDOCK responded, "You're the man."

51. On May 15, 2012, BRADDOCK and CC-1 engaged in a series of conversations regarding the four conduit contributions that CC-1 had delivered to Campaign Aide 1 the previous evening. BRADDOCK initially said, "I thought you told me it was ten. I think we have three for a total of seventy five hundred." CC-1 then advised BRADDOCK that Campaign Aide 1 had instructed him "to write one out to the [political party]," to which

BRADDOCK responded, "Oh. Gotcha." BRADDOCK then asked CC-1 to provide him with biographical information for certain individuals in whose names the checks had been written. While relaying the information to BRADDOCK, CC-1 said, "Just thinking about this. I don't know if you know, the last time, one of these a\_shole drug addicts bounced a check even though we put the f\_cking money right in their hand," to which BRADDOCK responded, "Right." CC-1 then asked BRADDOCK to give him the name of one of the conduit contributors so that he could "stay on top of it." BRADDOCK agreed to send CC-1 a text message with the information. In a subsequent conversation on the same date, CC-1 reiterated to BRADDOCK, "The last time one of these as\_holes bounced a check even though we put their money right in their hands. You know? You can't trust the drunks." BRADDOCK laughed and CC-1 continued, "You know. Grabbing these drunks and drug addicts and saying, 'here, write this check.' . . . ." BRADDOCK again laughed and said, "Oh, god." CC-1 said, "Like I said, you know, it was a very good investment for us to kill that bill. And they want to stay friends for a long time." After CC-1 advised BRADDOCK that he would attempt to get an address for one of the conduit contributors, BRADDOCK said, "Okay."

52. On May 15, 2012 at approximately 4:18 p.m., CC-1 called BRADDOCK and advised him that one of conduit contributors used in connection with the \$10,000 contribution the previous evening was an owner of one of the RYO smoke shops. CC-1 said, "I just realized something . . . that . . . guy . . . He is like one of the owners." BRADDOCK, responded, "Okay." CC-1 then asked BRADDOCK, "You wanna tear that one up and I'll, I'll get another one? Or get that one back that's uh, that's a bank check so get that back." BRADDOCK responded, "I gotta, I gotta hang up with you right now, she's on her way to



the f\_cking bank to deposit it right now. . . . Let me go, let me call, let me see if I can get her, I'll call you right back."

53. Immediately following the above call, BRADDOCK called Campaign Aide 2. BRADDOCK advised Campaign Aide 2 not to deposit the check that was made out in the RYO smoke shop owner's name. Campaign Aide 2 asked why she should not deposit the check, and BRADDOCK responded, "Just do it."

54. At approximately 4:25 p.m., BRADDOCK advised CC-1, "Well, we're all good." CC-1 said, "Alright, so I'll get that one from you and do a switch," to which BRADDOCK responded, "Yeah, sounds good."

55. On May 16, 2012, CC-1 called BRADDOCK to tell him that he was about to pick up the replacement check from "the store," and said, it would be "great if you could come down right there. That way, boom, boom, here's yours, here's yours, here's mine, you know?" BRADDOCK said, "Okay, let me see, let me see if I can do that. Uh, I'll give you a call right back."

56. Later that afternoon, CC-1 met Campaign Aide 1 at a restaurant in Southington, Connecticut. At that meeting, Campaign Aide 1 provided CC-1 with the check that BRADDOCK and CC-1 had agreed should be returned because it was written in a RYO smoke shop owner's name. In exchange, CC-1 provided Campaign Aide 1 with another \$2,500 check in the name of a different conduit contributor, who was not affiliated with the RYO smoke shops.

### Overt Acts

57. In furtherance of the conspiracy, and to accomplish its purposes and objects, BRADDOCK and his co-conspirators committed and caused others to commit at least one of the following overt acts, among others, in the District of Connecticut.

58. From November 2011 through May 2012, BRADDOCK and his co-conspirators accepted and caused others to accept \$27,500 in conduit contributions to the Campaign Committee, that is, eleven \$2,500 checks in the names of conduit contributors that were made payable to the Campaign Committee, as described in the following table:

Conduit Contributor	Overt Act Acceptance of Contribution
Conduit Contributor 1	\$2,500 Check dated: 11-15-11 Check accepted: 11-15-11
Conduit Contributor 2	\$2,500 Check dated: 11-__-11 Check accepted: 11-16-11
Conduit Contributor 3	\$2,500 Check dated: 12-8-11 Check accepted: 12-8-11
Conduit Contributor 4	\$2,500 Check dated: 12-8-11 Check accepted: 12-8-11
Conduit Contributor 5	\$2,500 Check dated: 4-12-12 Check accepted: 4-11-12
Conduit Contributor 6	\$2,500 Check dated: 4-10-12 Check accepted: 4-11-12
Conduit Contributor 7	\$2,500 Check dated: 4-10-12 Check accepted: 4-11-12
Conduit Contributor 8	\$2,500 Check dated: 4-8-12 Check accepted: 4-11-12

Conduit Contributor 9	\$2,500 Check dated: 5-14-12 Check accepted: 5-14-12
Conduit Contributor 10	\$2,500 Check dated: 5-14-12 Check accepted: 5-14-12
Conduit Contributor 11	\$2,500 Check dated: Check accepted: 5-16-12

All in violation of Title 18, United States Code, 371.

COUNT TWO  
(Contributions in the Name of Another)

59. The allegations contained in paragraphs 1 through 58 of this Indictment are realleged and incorporated as though fully set forth herein.

60. In or about April 2012 and May 2012, in the District of Connecticut and elsewhere, BRADDOCK and others known and unknown to the Grand Jury, aided and abetted by each other, knowingly and willfully accepted contributions of money, aggregating more than \$10,000 during the 2012 calendar year, made by one person in the name of another to the campaign of a candidate for the United States House of Representatives.

All in violation of Title 2, United States Code, Sections 437g(d)(1)(D)(i) and 441f and Title 18, United States Code, Section 2.

COUNT THREE  
(Causing False Statements)

61. The allegations contained in paragraphs 1 through 58 of this Indictment are realleged and incorporated as though fully set forth herein.

62. On or about May 2, 2012, in the District of Connecticut and elsewhere, in a matter within the jurisdiction of the executive branch of Government of the United States, BRADDOCK knowingly and willfully caused the submission of a materially false, fictitious



and fraudulent statement and representation, that is, the submission by an authorized campaign committee of a candidate for the United States House of Representatives to the Federal Election Commission of a report that was materially false and misleading in reporting the source and amount of contributions to the campaign by an individual.

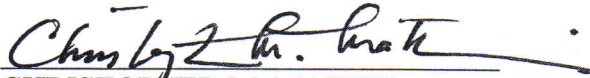
All in violation of Title 18, United States Code, Sections 1001(a)(2) and 2.

A TRUE BILL

FOREPERSON



DAVID B. FEIN  
UNITED STATES ATTORNEY



CHRISTOPHER M. MATTEI  
ASSISTANT UNITED STATES ATTORNEY



ERIC J. GLOVER  
ASSISTANT UNITED STATES ATTORNEY